

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**DECLARATION OF MICHAEL E. BLOOM IN SUPPORT OF SMARTMATIC'S
MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT AND TO
AMEND SCHEDULING ORDER**

I, Michael E. Bloom, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am a partner at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit A is a true and correct copy of Smartmatic's proposed First Supplemental Complaint.

4. Attached as Exhibit B is a true and correct copy of a redline reflecting the differences between Smartmatic's original Complaint and its proposed First Supplemental Complaint.


5. Attached as Exhibit C is a true and correct copy of a transcript of a video published on the website FrankSpeech, titled *Big News! We Have the Smartmatic Cast Vote Records From L.A. County and They Show Computer Manipulation*, dated November 4, 2022, available at <https://frankspeech.com/video/big-news-we-have-smartmatic-cast-vote-records-la-county-and-they-show-computer-manipulation>.

6. Attached as Exhibit D is a true and correct copy of a transcript of a video published on the website FrankSpeech, titled *Updates on the Smartmatic Lawsuit and The Cast Vote Records*, dated January 3, 2023, available at <https://frankspeech.com/video/updates-smartmatic-lawsuit-and-cast-vote-records>.

7. Attached as Exhibit E is a true and correct copy of a January 31, 2023 tweet posted on the @realMikeLindell account, known to be the personal Twitter account of Defendant Mike Lindell.

8. Attached as Exhibit F is a true and correct copy of a transcript of Mike Lindell's appearance on *Jimmy Kimmel Live!* on February 1, 2023, available at <https://www.youtube.com/watch?v=vGlDEbZvwLI>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Michael E. Bloom

Executed on March 10, 2023.